



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

DATE: April 30, 1985

TO: Division File

FROM: David S. Retzlaff *DSR*SUBJECT: Rockford/Rockford Products Plant #3 - Subpart F  
2010300031 - Winnebago County

EPA Region 5 Records Ctr.



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IEPA-DLPC

On November 2, 1984, Robert Wengrow and I went to Rockford Products, Plant #3, to investigate the use of a surface impoundment. They informed us that they had a permit from DWPC to discharge non-contact cooling water and storm run-off water into the impoundment (Permit #1984 EO-0221). This impoundment is considered a seepage pit. There is no discharge from it.

The permit conditions state that one upgradient and two downgradient monitor wells need to be installed. In addition, the wells need to be sampled for specific conductance, TOC, TOX and COD quarterly for two years. The first samples were taken on February 21, 1985 and received at DWPC in Rockford on April 15, 1985. These results show elevated levels of conductivity, TOC and TOX in one of the downgradient wells compared to the up-gradient well.

This writer returned to the above site on November 28, 1984 to take sample from the surface compoundment and have them analyzed for V.O.C.'s (See appropriate memo). These results showed total V.O.C. levels ranging from 70 ppb to 213 ppb. As a result of these numbers, I returned to the site on April 23, 1985 to discuss these results with Mr. Larry Hammond, Manager Plant Facilities and Mr. Steve Reid, Plant Manager. I informed them that, based on our results they had an unpermitted disposal facility that would be subject to Subpart F groundwater monitoring under RCRA. Additionally, they would be subject to Subpart K under Section 725 for surface impoundments. I performed a Subpart F inspection during this visit.

It should be noted that on my visit on 11/02/84, Mr. Hammond stated that they had been disposing of waste oil via sump pump into the lagoon up until January of 1984. There is still evidence of oil on the banks of the lagoon.

Larry Hammond stated that they were going to take samples of their own.

DSR/mlg

cc: Rockford Office  
Steve Strauss  
Gary King  
Mark Haney  
Cindy Davis  
Larry Eastep